UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and) on Behalf of All Others Similarly Situated,	Civil Action No. 3:16-cv-02267
Plaintiff,	Honorable Aleta A. Trauger
vs.	REVISED CASE MANAGEMENT ORDER
CORRECTIONS CORPORATION OF) AMERICA, et al.,	GRANTED IN PART
Defendants.	

Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund ("Plaintiff"), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America ("CoreCivic" or the "Company"), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, "Defendants") submit the following [Proposed] Revised Case Management Order.

WHEREAS, under the current case management order (ECF Nos. 180-181), the fact discovery cutoff is April 17, 2020, and the parties seek to complete discovery in this action, including depositions, as efficiently as possible;

WHEREAS, the current outbreak of the Coronavirus Disease (also known as COVID-19) and the efforts to prevent the spread of that disease have already caused administrative disruptions and are expected to continue to impact the ability of counsel to complete the necessary discovery by the current deadline:

WHEREAS, the Parties reserve the right to seek additional modifications of the case schedule in the event that the current outbreak does not dissipate; and

WHEREAS, the Parties have met and conferred and agreed, subject to approval of the Court, on the following deadlines to govern the remainder of the case:

Matter	Existing Date	New Date
Fact Discovery Cutoff	April 17, 2020	June 16, 2020
Deadline to Submit Joint Mediation Report	April 20, 2020	June 19, 2020
Deadline for Filing of Discovery-Related Motions	May 8, 2020	July 10, 2020
The Parties Declare Experts and Produce Expert Reports Pursuant to Fed. R. Civ. P. 26(a)(2)	June 12, 2020	July 10, 2020
Rebuttal	July 24, 2020	August 21, 2020
Completion of Expert Depositions	September 4, 2020	October 2, 2020

Matter	Existing Date	New Date
Dispositive & Daubert Motions		
Opening Briefs	October 16, 2020	November 13, 2020
 Oppositions 	December 18, 2020	January 15, 2021
• Replies	January 22, 2021	February 19, 2021
MANANIAN BARKAN YEXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XMXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Motions in Limine XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	<u> </u>
Motion in Liming Responses XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	April 27 x 2021 x x x x	May 27, 2021 XXXXXXXX
Premial FiningsXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXX	x Mxx 37x302x
Pretail Control of the Control of th	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	X XX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Pretrial Conference	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	Yyyxxyxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
Trickxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	**************************************	July 6, 2021 XXXXXXXXX

ALETA A. TRAUGER US. DISTRICT JUDGE

ROBBINS GELLER RUDMAN & DOWD LLP CHRISTOPHER M. WOOD, #032977 CHRISTOPHER H. LYONS, #034853

s/ Christopher M. Wood

CHRISTOPHER M. WOOD

414 Union Street, Suite 900 Nashville, TN 37219 Telephone: 800/449-4900 615/252-3798 (fax) cwood@rgrdlaw.com clyons@rgrdlaw.com

kennyb@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP DENNIS J. HERMAN WILLOW E. RADCLIFFE KENNETH J. BLACK Post Montgomery Center One Montgomery Street, Suite 1800 San Francisco, CA 94104 Telephone: 415/288-4545 415/288-4534 (fax) dennish@rgrdlaw.com Page 3 of 7 PageID #: 5534 Willow?@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP JASON A. FORGE 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax) iforge@rgrdlaw.com

Lead Counsel for Plaintiff

RILEY WARNOCK & JACOBSON, PLC STEVEN A. RILEY, #6258 MILTON S. McGEE, III, #024150

s/ Milton S. McGee, III MILTON S. McGEE, III

1906 West End Avenue Nashville, TN 37203 Telephone: 615/320-3700 615/320-3737 (fax)

LATHAM & WATKINS LLP DAVID J. SCHINDLER BRIAN T. GLENNON 355 South Grand Avenue Los Angeles, CA 90071 Telephone: 213/485-1234 213/891-8763 (fax)

LATHAM & WATKINS LLP ANNA E. BERCES MORGAN E. WHITWORTH 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 Telephone: 415/391-0600 415/395-8095 (fax)

Attorneys for Defendants Corrections Corporation of America, Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin

BARRETT JOHNSTON MARTIN & GARRISON, LLC JERRY E. MARTIN, #20193 Bank of America Plaza 414 Union Street, Suite 900 Nashville, TN 37219 Telephone: 615/244-2202 615/252-3798 (fax)

Local Counsel

Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

Kenneth J. Black

kennyb@rgrdlaw.com

• Paul Kent Bramlett

pknashlaw@aol.com

• Robert P. Bramlett

robert@bramlettlawoffices.com

• Christopher T. Cain

cain@scottandcain.com,ambrose@scottandcain.com

• Patrick V. Dahlstrom

pdahlstrom@pomlaw.com

• Jason A. Forge

jforge@rgrdlaw.com

• Brian T. Glennon

brian.glennon@lw.com

• Michael Goldberg

michael@goldberglawpc.com

• Marc Gorrie

mgorrie@pomlaw.com

• Dennis J. Herman

dherman@rgrdlaw.com,e file sd@rgrdlaw.com

• James A. Holifield, Jr

aholifield@holifieldlaw.com

• J. Alexander Hood , II

ahood@pomlaw.com

• Jeremy A. Lieberman

jalieberman@pomlaw.com,disaacson@pomlaw.com,lpvega@pomlaw.com

• Christopher Hamp Lyons

clyons@rgrdlaw.com,crosini@rgrdlaw.com,KennyB@rgrdlaw.com,e file sd@rgrdlaw.com

• Jerry E. Martin

jmartin@barrettjohnston.com,eseaborn@barrettjohnston.com,nchanin@barrettjohnston.com,jmartin@rgrdlaw.com,ggilbert@barrettjohnston.com

• Milton S. McGee, III

tmcgee@rwjplc.com,dgibby@rwjplc.com

• Faraz Mohammadi

faraz.mohammadi@lw.com

• Willow E. Radcliffe

willowr@rgrdlaw.com,WillowR@ecf.courtdrive.com

• Steven Allen Riley

sriley@rwjplc.com,dgibby@rwjplc.com

Brian Schall

brian@goldberglawpc.com

• David J. Schindler

david.schindler@lw.com

• Sarah A. Tomkowiak

sarah.tomkowiak@lw.com

• Morgan E. Whitworth

morgan.whitworth@lw.com,morgan-whitworth-8044@ecf.pacerpro.com

 $\bullet \ \ \, \textbf{Christopher M. Wood} \\ \text{cwood@rgrdlaw.com,cWood@ecf.courtdrive.com,willowr@rgrdlaw.com,e_file_sd@rgrdlaw.com,smorris@ecf.courtdrive.com} \\$

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)